

October 5, 2009

Peter DeVries,  
Council Chair,  
P.O. Box 42525,  
Olympia, WA 98504-2525,  
e-mail [sbcc@commerce.wa.gov](mailto:sbcc@commerce.wa.gov),  
fax (360) 586-9383

Re: Proposed **WSR 09-17-136**

Dear Mr. DeVries,

The department has concerns regarding proposed WAC 51-11-1552 rule.

1552 Pedestrian Escalators and Moving Pedestrian Walkways. Each pedestrian escalator or moving pedestrian walkway shall be equipped with an automatic control device to prevent operation of escalators and moving walkways when the mechanisms are unoccupied.

The proposed rule identifies and requires escalators to self start and stop when not in use. Today we do not have a national standard directing us on how this is to be designed and implemented. This is not to say that the American Society of Mechanical Engineers (ASME) are not looking to a solution, it is in the process of development.

It may be too soon to address WAC 51-11-1552 as an enforceable code at this time. We would suggest the proposed language be tabled until a viable design becomes available to the manufacturers and the Washington code officials. We also would request that when this is addressed again that the energy code refers to the ASME A17.1 code adopted by the state of Washington for Elevators and Escalators and the Revised Code of Washington 70.87.

Respectfully,

Jack Day  
Chief Elevator Inspector,  
State of Washington  
(360) 902-6128

Bill Watson  
Chief Elevator Inspector  
Department of Planning and Development  
City of Seattle  
(206) 684-8453